



Verizon Wireless
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Suite 400 West
Washington, D.C. 20005

October 10, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation
***Numbering Resource Optimization* – CC Docket No. 99-200**

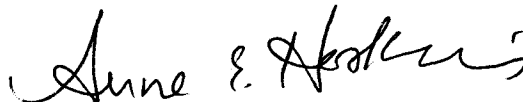
Dear Ms. Dortch:

On October 9, 2002, Verizon Wireless, represented by Anne Hoskins, Andrea Cooper and Lolita Smith, met with Jared Carlson, Deputy Chief, and Patrick Forster, Senior Engineer, both of the Policy Division, Wireless Telecommunications Bureau; Cheryl Callahan, Asst. Division Chief, and Sanford Williams, Attorney Advisor, both of the Telecommunications Access Policy Division, Wireline Competition Bureau.

The parties discussed various numbering issues, including wireless grandfathering, VZW's efforts to prepare for pooling, the need for relief for the 310 and 909 NPAs, the CPUC's petitions for authority to implement a TSO in those NPAs and to increase the block contamination threshold to 25% in California, and the special numbering needs of certain governments bodies for purposes of disaster recovery planning. An attached document is provided for your reference of some of the specific points discussed.

Pursuant to Sections 1.1206(b)(1) and (2), an original and one copy of this *ex parte* notification (with attachment) are provided for inclusion in the public record of the above-referenced proceeding. Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,


Anne Hoskins

cc: Jared Carlson
Patrick Forster
Cheryl Callahan
Sanford Williams

I. California Numbering (Relief, TSOs, 25% contamination threshold)

A. Background

- The CPUC has delayed area code relief through a combination of aggressive rationing, reclamation and pooling. Even the CPUC's own Audit Reports support the need for area code relief in certain area codes, particularly 909 and 310.
- The 310 Audit Report, submitted February 16, 2001 concluded, "Based on the audit findings, TD reaches three conclusions. First, carriers did not deliberately misreport their TN utilization data for the *March 310 Report*. Second, the audit authenticates the utilization data that carriers submitted for the *March 310 Report* except for the recommended TN adjustments as pointed out in this report. Third, the additional TNs found are not sufficient to extend the life of the 310 area code. The backup plan for the 310 area code should be implemented as directed in Decision 00-09-073." To date, relief plans in the 310 NPA are not being implemented.
- VZW has had to make three applications for emergency codes in the 909 NPA during the past 18 months to avoid running out of numbers. Carriers should not have to resort to such measures in order to get numbers to serve customers.

B. CA Numbering Statistics

- According to NANPA's August 2002 code assignment data, the 310 NPA has:
19 unassignable NXXs, 4 NXXs set aside for the PA, and 5 NXXs set aside for non-LNP capable carriers (*total 28 codes*).
- The 909 NPA has:
20 unassignable NXXs, 9 set aside for the PA, and 7 set aside for non-LNP capable carriers (*total 36 codes*).
- According to the September 13th Pool Administrator's report, the PA needs 26 codes in the 909 NPA over the next 12 months based on wireline and wireless forecasts (*but only 9 are set aside of the remaining 36 codes*). Likewise, in the 310 NPA the PA needs 8 codes over the next 12 months (*but only 4 are set aside of the remaining 28 codes*). Even if carrier forecasts are imperfect, the number of codes potentially available for pooling is dangerously low. Relief is needed, especially given the 10-13 month lead-time needed for the industry to implement an overlay or a geographic split.

II. Grandfathered Wireless Numbers

- Grandfathering is the practice of allowing wireless customers and carriers on the affected side of a geographic split boundary to retain their existing 10-digit NPA-NXX-XXXX designation.

- State PUCs authorized grandfathering as an appropriate policy response when they selected geographic splits as the form of area code relief instead of overlays. Grandfathering was one method of mitigating the impacts of forced number changes caused by splits and the need to reprogram wireless customers' handsets. In several instances, VZW has been faced with reprogramming handsets for tens of thousands of customers for a given NPA split.
- With the advent of TBNP and LNP, landline carriers do not want to receive individual TNs or 1K blocks from grandfathered NXXs. Dealing with these numbers may require network upgrades typical of those required for an all-services overlay.
- Verizon Wireless is concerned about the impacts, inconvenience, and confusion wireless customers will endure if wireless carriers are forced to:
 - number change customers' telephone numbers and reprogram their handsets; or
 - rehome customers' service from another rate center, thereby changing their local calling scope.

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